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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Amendment of Section 73.606(b))
Table of Allotments,)
TV Broadcast Stations,)
(Campbellsville and Bardstown, Kentucky))

MM Docket No. 01-148
RM-10141

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch

REPLY COMMENTS OF
INDEPENDENCE TELEVISION COMPANY

Independence Television Company ("Independence"), licensee of Television Stations WDRB-TV, Louisville, Kentucky, and WFTE(TV), Salem, Indiana, by its attorneys and pursuant to Section 1.420 of the Commission's Rules, hereby respectfully submits these Reply Comments on the *Notice of Proposed Rule Making* in MM Docket No. 01-148 (the "Notice").¹ The *Notice* seeks comment on the Petition for Rule Making (the "Petition") filed by Louisville Communications, LLC, to change the community of license for WBKI-TV (the "Station") from Campbellsville, Kentucky, to Bardstown, Kentucky.

The Petitioner and Independence are the only parties that submitted Comments in this proceeding. Even a cursory review of those Comments confirms that the Petitioner has not even attempted to satisfy the high burden for waiver or reinterpretation of the Commission's long-standing prohibition against removing the sole local television service from a community. Accordingly, the Commission should dismiss the Petition forthwith.

¹ The *Notice of Proposed Rule Making (Campbellsville and Bardstown, Kentucky)*, DA 01-1594 (rel. July 6, 2001), established September 11, 2001, as the Reply Comment filing deadline. The FCC closed its offices on September 11, 2001, due to a national emergency. Accordingly, these Reply Comments are timely filed on September 12, 2001. See 47 C.F.R. § 1.4(e)(1).

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Introduction

As the Commission is well aware, the sole local television service allotted to the community of Campbellsville is WBKI-TV. The Petition devotes exactly one paragraph to the argument that the Commission should elevate Class A-eligible television station W04BP to the same status as a full-power television station for allotment purposes and thus permit it to abandon Campbellsville.² In the *Notice*, the Commission properly observed that “we consider this [the Petition] to be a proposed removal of a sole local service” from Campbellsville, the “[P]etitioner’s claims notwithstanding.”³ Remarkably, however, the Comments go even farther than the Petition to argue – in just three paragraphs – that the Commission should treat W04BP as equivalent to a full-power television station “whether or not the pending Class A license application is granted.”⁴

This breezy analysis stands in stark contrast to the unequivocal requirements of Section 307(b) of the Communications Act, as amended, and the Commission’s long-standing prohibition on removal of a sole local television service. Independence’s Comments demonstrated the folly of adopting the Petitioner’s Class A views, especially with regard to the specific low power television station at issue here – W04BP. These Reply Comments further detail the absurdity of the Petitioner’s positions in light of the facts and relevant case law.

The Petitioner’s cursory treatment of such a serious issue is quite in keeping with its apparent disregard for the Commission’s rules and policies on service to licensed communities. It is now clear that the Petitioner operates the Station as if the Commission already has changed its community of license to Bardstown. Its Comments detail the Station’s active involvement in events occurring in Bardstown (but not Campbellsville) and its broadcast of local programming targeting Bardstown (but

² Petition at ¶ 10.

³ *Notice* at ¶ 4.

⁴ Petitioner Comments at ¶ 4.

not Campbellsville).⁵ The Station provided Independence with copies of its Issues and Programs lists for the past six quarters (or at least parts thereof), but those reports identify no local programming at all, and certainly no programming responsive to any needs ascertained to be important to Campbellsville residents.⁶ Indeed, even the chief executive government official of Taylor County, of which Campbellsville is the largest community, is of the opinion that WBKI-TV already has abandoned Campbellsville and Taylor County.⁷

For these reasons, Independence submits that it is time for the Commission to remind the Petitioner of its critically important statutory obligation to serve Campbellsville by denying the Petition.

I. The Petitioner Failed to Justify A Waiver of the Commission's Prohibition.

To the extent that the Petitioner seeks a waiver permitting it to remove WBKI-TV from Campbellsville, it has wholly failed to satisfy the stringent standards for such a waiver. "An applicant for waiver faces a high hurdle even at the starting gate. 'When an applicant seeks a waiver . . . it must plead with particularity the facts and circumstances which warrant such action.'"⁸ Moreover, *WAIT Radio* increases a waiver applicant's burden as its requested deviation from the Commission rule increases.⁹ The Commission takes these requirements seriously: it has found circumstances sufficient to justify a waiver of the prohibition on removal of a community's sole local service in just two highly unusual factual settings.¹⁰

⁵ *Id.* at ¶ 6.

⁶ See Second Declaration of Wilson Hatcher and associated material, attached hereto as Exhibit A.

⁷ See Letter from Eddie Robinson to FCC Secretary dated September 11, 2001, attached hereto as Exhibit B. The FCC's Public Notice did not alert Mr. Robinson to WBKI-TV's proposal. Apparently, he only learned of this proceeding when Independence contacted him about it.

⁸ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), quoting *Rio Grande Family Radio Fellowship, Inc. v. FCC*, 406 F.2d 664 (D.C. Cir. 1968) (per curiam).

⁹ *Id.*

¹⁰ Independence Comments at 6.

In stark contrast to the exacting requirements of *WAIT Radio* and the Commission's allotment precedent, the Petitioner here does not even attempt to plead any public interest benefits that would result from waiving the prohibition for WBKI-TV. According to the Petitioner, quite the opposite is true: a change in the Station's community of license will have no effect at all. The Station already serves Bardstown with a city grade signal, is associated with local Bardstown events, and broadcasts programming directed to Bardstown residents.¹¹ With regard to the abandoned city, the Petitioner claims that W04BP "should continue in the future to satisfy the requirement of maintaining local television service for the residents of Campbellsville whether or not the pending Class A license application is granted."¹² And it is otherwise clear that WBKI-TV already has ceased treating Campbellsville as its community of license.¹³

If Petitioner's representations are correct, then waiving the Commission's prohibition to change WBKI-TV's community of license will have *no effect on the public at all*. Clearly, if a waiver of the Commission's prohibition would not result in any affirmative public interest benefits whatsoever, then the waiver falls far short of the high burden required by *WAIT Radio*. Indeed, the Petitioner's failure to plead with specificity the compelling public interest benefits resulting from a waiver confirm that a waiver of the Commission's prohibition in these circumstances is unjustified and indefensible. Consequently, to the extent that the Petitioner seeks a waiver of the prohibition rather than a reinterpretation of it, the Petitioner has wholly failed to justify its request.

¹¹ Petition at ¶ 12; Petitioner Comments at ¶ 6.

¹² Petitioner Comments at ¶ 4.

¹³ See, e.g., Exhibit B.

II. There is No Basis for Reinterpreting Section 307(b) and the Commission’s Case Law to Treat LPTV Stations As Full-Power Television Stations.

To the extent that the Petitioner seeks a reinterpretation of Section 307(b) and the Commission’s allotment precedent, its attempt is specious. Low power television stations, even those with Class A status, cannot serve as substitutes for full-power television stations.

As the Petitioner itself concedes in its pleadings, Section 307(b) charges the Commission with ensuring a “fair, efficient, and equitable distribution” of television licenses.¹⁴ “The Commission fulfills the 307(b) obligation by making available for licensing only a frequency that has been assigned to a specific community in the Table of Allotments through a rulemaking proceeding. A system of priorities guides the Commission’s 307(b) determinations, setting preferences for applicants proposing to establish a station in a nonserved or underserved community.”¹⁵

In contrast, neither Class A stations nor non-Class A low power television stations are subject to the TV Table of Allotments, because such stations “are not required to meet basic full-service station requirements, *i.e.* provide responsive programming or maintain a presence in the community, cover the community with an adequate strength signal, etc. Although LPTV and translator stations are licensed to specific communities, the Commission has concluded that Section 307(b) issues are not relevant in the context of these secondary services.”¹⁶

Consequently, elevating the status of Class A and non-Class A LPTV stations as requested by the Petitioner would betray the Commission’s prior determinations that such stations are not functionally or legally equivalent to full-power stations for allotment purposes, despite the meritorious

¹⁴ See Petition at ¶ 2; Petitioner Comments at ¶ 13.

¹⁵ *Implementation of Section 309(j) of the Communications Act*, 13 FCC Rcd 15920, ¶ 115 (1998) (subsequent history and internal citations omitted).

¹⁶ *Id.* at n. 109, *citing*, *Low Power Television and Television Translator Service*, 2 FCC Rcd 1278, ¶ 24 (1987). See *Establishment of a Class A Television Service*, 15 FCC Rcd 6355, ¶¶ 2, 27 (2000) (“*Class A R&O*”), *on recon.*, 23 C.R. 893 (2001) (“*Class A MO&O*”).

service provided by many LPTV stations.¹⁷ Such a move also would undercut the entire allotment system because it would enable a full-power television station (or FM station) to abandon a rural or mid-size community whenever the Commission authorized an LPTV station (or LPFM station) in its community. Because there are more than 950 LPTV stations eligible for Class A status,¹⁸ and about 1,350 other LPTV stations,¹⁹ Petitioner's proposed reinterpretation would facilitate the widespread migration of stations from rural to urban communities in clear violation of Section 307(b). This, of course, would open the floodgates to hundreds of similar "move-ins" from rural communities throughout the country, thereby effectively razing the Commission's statutory mandate.²⁰

It is also worth repeating that the LPTV television service is no substitute for full-power television service on a practical level. These stations operate at drastically reduced power levels and serve a much smaller geographic region than full-power television stations.²¹ Consequently, even a licensed Class A eligible LPTV station cannot hope to replicate the type, extent, or manner of service provided by full-power television stations. Moreover, even with Class A status, LPTV stations generally lack mandatory carriage rights,²² and they remain subject to displacement by certain full-power analog and digital television stations.²³

¹⁷ See *PZ Entertainment Partnership, L.P.*, 7 FCC Rcd 2696, ¶ 4 (1992) (affirming denial of applications based on Commission "concern that a secondary source like an on-channel booster be allowed to demonstrate compliance with the Commission rules and policies implementing Section 307(b).").

¹⁸ *Certificates of Eligibility for Class A Television Status*, DA 00-1224 (rel. June 2, 2000).

¹⁹ *Class A R&O*, 15 FCC Rcd 6355, ¶ 2.

²⁰ *Modification of FM and TV Authorizations to Specify a New Community of License*, 5 FCC Rcd 7094, ¶ 11 (1990) ("*Community of License MO&O*") ("[W]e believe it is axiomatic that our allotment priorities and policies are and should be applied consistent with and in furtherance of the goals of Section 307(b) of the Act").

²¹ *Class A MO&O* at ¶ 2.

²² *Id.* at ¶¶ 39-42.

²³ *Id.* at ¶ 54 (Class A stations must protect certain proposed but not authorized full-power analog stations); *id.* at ¶¶ 61, 63 (Class A stations must protect proposals to maximize full-power digital facilities and must accommodate certain facility modifications of full-power digital stations).

Neither law nor policy nor fact justify the Petitioner's proposed reinterpretation of Section 307(b) and the Commission's implementing rules, policies, and decisions. Quite simply, the existence of a Class A or non-Class A low power television station cannot duplicate the service provided by a full-power television station and therefore cannot serve as an "existing service" for allotment purposes.

III. As a Practical Matter, W04BP Cannot Be Deemed to Be Equivalent to a Full-Power Television Station.

If the Commission accepts Petitioner's invitation to even consider Class A and even non-Class A low power television stations as equivalent to full-power stations for allotment purposes, the Commission should not apply the new principle here. The Campbellsville low power television station, W04BP, provides just a fraction of the service that is required to be provided to Campbellsville by WBKI-TV or that might be provided by a more typical low power television station.

The Petitioner's Comments apply its empty legal arguments to W04BP with remarkable brevity. In a single paragraph, the Petitioner claims that W04BP already serves as a complete substitute for a full-power television station: "Campbellsville University currently does an excellent job of programming to meet the local needs and interests of the community."²⁴ It makes this bold proclamation without a single piece of documentation, affidavit, declaration, exhibit, citation, or other authority, almost as if to fool the Commission about the service rendered by this LPTV station.²⁵

The lack of support for the Petitioner's naked claim is undoubtedly due to the fact that no authority can sustain its claim. As detailed in Independence's Comments, W04BP has neither served Campbellsville nor been viewed locally as a "voice" for Campbellsville – or for the University to which it is licensed.²⁶ This LPTV station is not satisfying the minimum operating requirements for Class A

²⁴ Petitioner Comments at 4.

²⁵ *Cf.* 47 U.S.C. § 309(d)(1) (petitions to deny renewal applications) ("Such allegations of fact shall, except for those of which official notice may be taken, be supported by affidavit of a person or persons with personal knowledge thereof.")

²⁶ Independence Comments at 10-11.

eligibility, as it has been on the air only intermittently for the last few years. When W04BP does operate, it broadcasts with less than one percent of the power of a VHF full-power station. Among other fatal deficiencies, W04BP's Class A license application contains an admission that the LPTV station violates the Commission's interference rules with regard to an adjacent channel full-power station, which itself serves as a sufficient basis for the immediate cessation of W04BP's operations.²⁷

For these reasons, W04BP's service simply cannot be deemed equivalent to that provided by a full-power television service for allotment purposes. Indeed, this conclusion remains true even if the Commission accepts the Petitioner's request to elevate Class A and/or non-Class A low power television stations to the same status as full-power television stations. In short, Campbellsville's sole local television service for allotment purposes is WBKI-TV.

IV. A Comparison Under the Commission's Allocation Priorities Favors Campbellsville.

In considering a reallocation proposal, the Commission compares the existing allotment against the proposed allotment to determine whether the reallocation will result in a preferential arrangement of allotments under its television allotment priorities.²⁸ A comparison of WBKI-TV's existing community with its proposed community favors retention of WBKI-TV in Campbellsville. Accordingly, the requested reallocation of the Station's Channel from Campbellsville to Bardstown would not serve the public interest.

²⁷ See 47 C.F.R. § 74.703(c) ("Upon notice . . . that such interference is caused by spurious emissions of the station, operation of the station shall be immediately suspended and not resumed until the interference has been eliminated..")

²⁸ *Modification of FM and TV Authorizations to Specify a New Community of License*, 4 FCC Rcd 4870, ¶ 25 (1989) ("Community of License R&O"), *recon. granted in part*, 5 FCC Rcd 7094 (1990) ("Community of License MO&O"). The television allotment priorities are (1) to provide at least one television service to all parts of the United States, (2) to provide each community with at least one television broadcast station, (3) to provide a choice of at least two television services to all parts of the United States, (4) to provide each community with at least two television broadcast stations, and (5) to assign any remaining channels to communities based on population, geographic location, and the number of television services available to from stations in other communities.

Currently, the allotment of WBKI-TV's Channel to Campbellsville provides that community with its first – and only – local television service, thereby satisfying priority two. The Petition proposes to provide a first local service to Bardstown, thereby also satisfying priority two. Setting aside the issue of removal of Campbellsville's sole local service, and assuming (incorrectly) that Campbellsville and Bardstown are otherwise comparable communities, a comparison of the existing and proposed allotment results in a tie. In such cases, the Commission selects the community with the larger population, all other things being equal.²⁹ In this case, Campbellsville is preferred over Bardstown because its 2000 population (10,498) exceeds that of Bardstown (10,374).³⁰

Thus, even assuming facts most favorable to the Petitioner, Campbellsville is still preferred over Bardstown. In reality, the allotments are not comparable, and a comparison of the two confirms that public interest factors clearly support retention of WBKI-TV's Channel in Campbellsville.

Campbellsville is generally a rural community that is located some 64 miles³¹ and more than two hours by car from Louisville.³² In contrast, Bardstown is only half as far from Louisville: just 32 miles and a drive of less than one hour. Moreover, a review of Warren Publishing's *2000 Cable & Station Coverage Atlas* indicates that Campbellsville receives Grade B service only from two full-power, full-service television stations in the Louisville DMA,³³ and it does not appear to receive City Grade service from any station other than WBKI-TV. Bardstown, however, receives Grade B or better service from all nine market stations. And, last but certainly not least, reallocating WBKI-TV's Channel to

²⁹ *Blanchard, Louisiana and Stephens, Arkansas*, 8 FCC Rcd 7083 (1993) (channel should be allotted to the community with the larger population when choosing between two mutually exclusive proposals that both trigger the first local service priority and involve comparable communities above a threshold of reception service). *Accord Athens and Atlanta, Illinois*, 11 FCC Rcd 3445 (Allocations Br. 1996).

³⁰ See Independence Comments at Exhibit E.

³¹ Distance data derived from <www.indo.com/cgi-bin/dist?>.

³² Driving distance data derived from <[>](http://www.mapquest.com).

³³ These stations are WBKI-TV and WLKY-TV. In addition, Campbellsville also receives Grade B service from WKZT-TV, Elizabethtown, Kentucky, which is a satellite of the Louisville PBS affiliate.

Bardstown would remove the last vestige of the Station's connection to Campbellsville in derogation of Section 307(b). In short, a comparison of these two communities leads to the unmistakable conclusion that Campbellsville is more rural, removed, and remote than Bardstown and therefore more deserving of a local television service.

The differences between Campbellsville and Bardstown are highly relevant to this proceeding. In adopting the change of community procedures, the Commission reiterated its policy to "apply the allotment priorities in a flexible manner where circumstances warrant." Indeed, it observed as follows:

It has never been Commission policy to adhere rigidly to the concept of localism if the result of that adherence is to undermine the fair, equitable, and efficient distribution of radio service mandated by Section 307(b) of the Communications Act. We have consistently given little or no weight to claimed first local service preferences if, given the facts and circumstances, the grant of a preference would appear to allow an artificial or purely technical manipulation of the Commission's 307(b) related policies. We see no reason to depart now from this policy, and we believe it is fully applicable in proceedings to amend the FM and TV Tables of Allotments.³⁴

Over the course of many decades, the Commission's has adopted and applied policies designed to ensure that licensees do not abandon rural communities. Comparing Campbellsville with Bardstown confirms that the former is not only preferred under the Commission's television allotment priorities, but that Campbellsville is also preferred under the Commission's general allotment policies. Accordingly, the Commission must deny the Petition.

³⁴ *Community of License MO&O* at ¶ 14.

CONCLUSION

The City of Campbellsville deserves a full-power television station that is responsive to its needs and interests as required by Section 307(b) of the Communications Act. While it is apparent the WBKI-TV's licensee already has changed the Station's focus to Bardstown, the Commission need not compound this error by granting the Petition. The Petitioner has not satisfied the high burden for an unprecedented waiver or reinterpretation of the Commission's prohibition on removal of sole local service. Moreover, as a practical matter, low power television stations, especially W04BP, are ill-equipped to fill the void of a full-service television station, Petitioner's unsupported claims notwithstanding. For these reasons, Independence respectfully requests that the Commission deny the Petition.

Respectfully submitted,

INDEPENDENCE TELEVISION
COMPANY

By: 

John R. Feore, Jr.
Kevin P. Latek

Its Attorneys

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September 12, 2001

EXHIBIT A

Second Declaration of Wilson Hatcher and associated material

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Section 73.606(b))	
Table of Allotments,)	MM Docket No. 01-148
TV Broadcast Stations,)	RM-10141
(Campbellsville and Bardstown, Kentucky))	

SECOND DECLARATION OF WILSON HATCHER

I am Wilson Hatcher, Community Affairs Coordinator for WDRB-TV, Louisville, Kentucky. I worked at WDRB-TV for two years beginning in 1971, and I have worked continuously at WDRB-TV since 1976.

On Thursday, August 23, 2001, I visited the main studio of WBKI-TV, Channel 34, Campbellsville, Kentucky. While at that studio, I ordered one copy of WBKI-TV's issues and programs lists for 2000 and 2001, as well as copies of letters from the public.

The attached material is a true and correct copy of the documents I reviewed while at WBKI-TV and those that I received from WBKI-TV thereafter, except that the letters from the public are not attached hereto.

I declare under penalty of perjury that the foregoing is true and correct.

By: Wilson Hatcher
Wilson Hatcher

September 10, 2001



WBKI Television

Channel 34, Cable 7

Public Service Announcements Report

WBKI TV 34 / CABLE 7

The following is a listing of some of the significant issues responded to by station WBKI, Louisville, Kentucky, along with the most significant public service announcement treatment of those issued for the period **July 1, 2001** to **September 30 2001**. The listing is by no means exhaustive. The order in which the issues appear does not reflect any priority or significance. Please see the attached list for the dates and times these aired.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
American Cancer Society	"Cycle of Hope"	15 seconds	The goal of the campaign is to create cancer awareness, particularly prostate cancer awareness.
American Cancer Society	"Cycle of Hope"	30 seconds	The goal of the campaign is to create cancer awareness, particularly prostate cancer awareness.
ASPCA	General	30 seconds	The goal of this campaign is to promote awareness of animal rights to children and adults.
National Arbor Day	General	60, 30, 20, 15 and 10 seconds	The goal of this campaign is to promote conservation efforts.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Consumer Handbook	Tips Available	60, 30, 20, 15 and 10 seconds	The goal of this campaign is to promote the consumer handbook and inform the public they can send away for the book to receive helpful information.
Children's Academics	"Math"	30 seconds	The goal of this campaign is to motivate children to study math in school, and that it is fun to learn.
Computers and Kids	"Teen Central"	30 seconds	The goal of this campaign is to encourage children to use the "Teen Central" website if they are in need of emotional support.
Osteoporosis Foundation	"Take Charge"	20 seconds 30 seconds 60 seconds	The goal of this campaign is to adults, particularly women, to take care of themselves and visit their doctors in order to stay healthy and stay clear of osteoporosis.
Occupational Safety	"Roll Bars"	30 seconds	The goal of this campaign is to encourage farmers or anyone who uses heavy equipment to install roll bars on their tractors in case of an accident. It could prevent serious injury and save a life.
Carbon Monoxide	"Tractor"	30 seconds	The goal of this campaign is to encourage farmers or anyone who uses heavy farm equipment to regularly check equipment to make sure it is running properly so there is no chance of carbon monoxide poisoning.
The Vision Counsel	"Alex Trebek"	60 seconds 30 seconds 20 seconds	The goal of this campaign is to promote that viewers, especially senior citizens, have routine eye exams in order to keep their vision clear and healthy.
KY Humane Society	"Friends 1" & "Friends 2"	2x 30 seconds 2x 15 seconds 1x 10 second	This campaign promotes animal adoption in Louisville, KY.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
AmVets	Miss America 2000	60, 30, 20, 10 seconds	This campaign promotes the welfare and care of American veterans by informing viewers of their needs and asking for assistance.
Operation Brightside	Clean Air	60 seconds	This campaign informs adult and children viewers about the importance of keeping their city clean.
Brain Injury	"Version 1 & 2"	30 seconds	The goal of the campaign is to inform and educate the public on preventing brain injury, by wearing helmets and protecting their heads during sports and other activities.



WBKI Television

Channel 34, Cable 7

Public Service Announcements Report

WBKI TV 34 / CABLE 7

The following is a listing of some of the significant issues responded to by station WBKI, Louisville, Kentucky, along with the most significant public service announcement treatment of those issued for the period **April 1, 2001** to **July 31 2001**. The listing is by no means exhaustive. The order in which the issues appear does not reflect any priority or significance. Please see the attached list for the dates and times these aired.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Crime Prevention Coalition Of America	"Look Around" "Guess Again" "Bleep"	:20 :15 :30	The goal is to persuade teens to become active partners in their community's safety and help adults recognize that most teens are positive contributors to crime prevention. TEENS
Social Security Administration	"Quiz Show"	:60	The goal is to provide American workers with important information about the role of Social Security in their financial future. Financial planning is not a game – Social Security plays a critical role in the financial future of all Americans. ADULTS
Coordinated Campaign for Learning Disabilities	"Learning Disabilities"	:15 :30	The goal of the campaign is to show parents how early intervention can help a child with a learning disability succeed in school and in life. ADULTS
US Department of Health	"Cosby" (4 Versions)	:30	The goal of the campaign is to inform children about the importance of taking care of themselves through nutrition, dental hygiene, immunization etc. CHILDREN

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Children's Academics	"Math"	:30	The goal of the campaign is to motivate children to study math in school, and that it is fun to learn math. CHILDREN
Computers and Kids	"Teen Central"	:30	The goal of this campaign is to encourage children to use the "Teen Central" website if they are in need of emotional. CHILDREN
Junior Achievers	"Junior Achievers"	:30 :30 :60	The goal of this campaign is to encourage adults, to get involved with kids, and to donate the organization locally. ADULTS
United States Army	"Op Graduation Ashley" "Op Graduation Montage" "Op Graduation Thomas" "Op Graduation Joey"	:30 :30 :30 :30	The goal of this campaign is to encourage middle and high school students to stay in school and go on to earn a high school diploma. CHILDREN & TEENS
US Dept. of Transportation	"Ice Cream"	:30	The goal is to encourage all drivers and passengers to buckle up on every trip. There is <i>never</i> a safe time to drive unbuckled. ADULTS
National Arbor Day Foundation	"Rain Forest Rescue"	:60 :30 :20 :15 :10	The goal of this campaign is to inform children that rain forests are home to more than half of our planet's plant and animal species – they help sustain life on our planet. But half of these forests have been destroyed – we need to care for the forests and plant more trees. CHILDREN
Lightning Protection Institute	"Lightning Kills"	:30 :60	The goal of this campaign is to address the dangers of lightning and the importance of learning how to protect oneself and stay safe during lightning storms. ADULTS
Secondhand Smoke Campaign	"The Promise"	:60 :30	The goal of this campaign is to encourage parents who do smoke to go outside in order to protect their children from secondhand smoke. ADULTS

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Drunk Driving Prevention Campaign – US Dept. of Transportation	"Marcus"	:20	The objective of this campaign is to reduce the number of fatalities caused by alcohol impaired drivers by motivating potential interveners to do whatever it takes to prevent someone who has had too much to drink from getting behind the wheel of a car. ADULTS
Education – Horatio Alger Assn.	"Ignite the Dream"	:30	This spot alerts adults to the fact that young people in our society suffer from many kinds of adversity, but that hope and opportunity still exist for them if we are only willing to reach out and serve as mentors and role models. ADULTS
Afterschool Programs	"What Is A Hero?"	:10 :20	This campaign is to ensure that every child in America has access to quality afterschool programs by the year 2010. By raising national and local awareness, the importance of afterschool programs is stressed in order to keep children safe and provide them with supervised, structured activity. ADULTS
Mentor A Child	"Save The Children - Baseball"	:30	This campaign encourages caring adults to call a toll-free hotline in order to identify organizations in their community that are in need of mentors or find out about other ways to support mentoring programs. Caring adults who serve in the capacity of mentors enormously influence young people's desire and ability to stay in school, set goals, and achieve their full potential. ADULTS
National Safety Council	"Safety An Important Call"	:20 :30 :60	This campaign urges the implementation of public education programs to encourage the selective and prudent use of cellular phone use while driving. ADULTS
Earth Share - Environment	"This Is"	:30 :60	This campaign educates the public about a simple and effective method for caring for all aspects of our environment – environmentally conscious employees and workplaces can support the vital programs of dozens of environmental groups through a charitable giving drive. ADULTS
U.S. Health Department	"Teeth"	:30	This campaign explains the importance of children (and adults) of taking care of their teeth, brushing, flossing, etc. This campaign is geared towards. CHILDREN
March of Dimes	"Stork"	:15	The goal of this campaign is to encourage mothers-to-be to take care of themselves during their pregnancies and to help prevent birth defects. ADULT WOMEN

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Schools for Excellence	"Schools for Excellence"	:60	The goal of this campaign is to promote excellent academics, and to remind teachers, parents, and children that it takes all of us to make an excellent school. It also asks adults and parents to become more involved with their local schools. ADULTS & CHILDREN
Bureau of Motor Vehicles	"License Plates"	:30 :30	The goal of this campaign is to remind viewers to renew their license plates, and to consider making a donation to support schools, the environment, etc., and receive a special license plate. ADULTS
American Speech & Hearing Asso.	"American Speech & Hearing Asso."	:15 :60	The goal of this campaign is remind viewers the importance of having your child's speech and hearing checked, and to be more thoughtful in communicating with someone who does have speech or hearing problems. ADULTS
Vote America's Tree	"Vote America's Tree"	:30 :60	This campaign encourages viewers to log on to a specific website to vote for America's national tree. ADULTS & CHILDREN
RADD	"Marc Anthony"	:30	This campaign shows the Recording Artists & Actors support against drunk driving. It encourages viewers not to drink and drive or if they are going to drink to have a friend or cab drive for them. YOUNG ADULTS
Drug Prevention	"Drug Prevention"	:30	This campaign is designed to help education adults and kids about illegal drugs, and to help them say no to drugs. ADULTS & CHILDREN
Buckle Up	"African Americans"	:30	This campaign educates African Americans about the importance of wearing seat belts, explaining that the statistics for African Americans dying due to not wearing seat belts is very high. YOUNG ADULTS
RADD	"98 Degrees"	:30	This campaign shows the Recording Artists & Actors support against drunk driving. It encourages viewers not to drink and drive or if they are going to drink to have a friend or cab drive for them. YOUNG ADULTS

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Wildlife Defenders	"Wildlife Defenders"	:30 :60	The goal of this campaign is to educate adults and kids about saving wildlife and endangered species. ADULTS & CHILDREN
Lend A Hand Partnership	"Drop Your Change To Make A Change"	:30	The goal of this campaign is raise funds in the Greater Louisville DMA where Wendy's restaurants are located. These funds will be used to purchase and distribute school supplies to elementary school students selected by the school districts based on need. ADULTS
Forest Resources	"Log-A-Load For Kids"	:30	The goal of this campaign is to inform the public that the Kentucky forestry industry raises money to donate to the University of Kentucky Childrens' Hospital in Lexington, and to encourage other foresters to do the same. ADULTS
National Institute of Health	"Garfield-Sleep Well. Do Well"	:30 :15	The goal of this campaign is to educate America's children – directly and through their parents, teachers and pediatricians – about the importance of adequate nighttime sleep. CHILDREN
McGruff Crime Prevention	"Bully"	:30	The goal of this campaign is to help children learn to deal with bullies. It reminds children the best way to deal with a bully is to walk away. CHILDREN
American Dental Association	"Dino Baby's First Tooth"	:30	The goal of this campaign is to explain to small children what teeth are and how to take care of them (brushing, flossing, etc). It promotes good dental hygiene. CHILDREN
Disabled American Veterans	"Land Of The Free, Home Of The Brave"	:10 :30	The goal of this campaign is to remind Americans of the heroic contributions that our veterans have made to keep us free. Viewers can respond to the DAV's website where they will be linked to volunteer opportunities in their area and other ways they can get involved with veterans. ADULTS

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Libraries	"Skateboard"	:30	The goal of this campaign is to encourage kids to go to their local libraries and start reading books. It shows that it is cool to read! CHILDREN
Use a Computer	"Get Tech"	:30	The goal of this campaign is to encourage adults and children to learn how to use computers. It demonstrates that computers can take us all over the world and teach us many different things. ADULTS & CHILDREN
Americorps	"Americorps"	:30	The goal of this campaign is to encourage children and adults to join and support the Americorps. It provides information on how to contact Americorps. ADULTS & CHILDREN
MADD	"Tiffany"	:30	This campaign shows the importance of stopping drunk driving. It focuses on a Purdue University student who was killed by a drunk driver. It encourages viewers not to drink and drive or if they are going to drink to have a friend or cab drive for them. YOUNG ADULTS
Boys & Girls Club	"Boys & Girls Club"	:10	This campaign encourages adults to get involved with their local boys and girls club, that the children in these clubs really would appreciate good role models. ADULTS & CHILDREN
Boys & Girls Club	"Boys & Girls Club"	:30 :60	This campaign encourages adults to get involved with their local boys and girls club, that the children in these clubs really would appreciate good role models. ADULTS
America's Promise	"Colin Powell"	:30	This campaign is geared towards taking care of and supporting American Veterans. ADULTS
American Diabetes Association	"Grandpa"	:30	This campaign is designed to remind adults, especially older adults to take care of themselves if they have diabetes through nutrition, exercise, and medical attention. It reminds viewers to take proper measures to prevent diabetes, too. ADULTS

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Marines	"Marines"	:30	The goal of this campaign is to promote the Marine Corp and encourage young adults and adults to join the marines as a career. YOUNG ADULTS
TARC	"Request Your Stop"	:30	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explained how patrons can request their bus stop when they are ready to exit the bus. This helps patrons who have never ridden a bus before learn that it is quite easy to do. YOUNG ADULTS WBKI produced this spot.
TARC	"Request your Schedule"	:30	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explained how patrons can request a bus schedule and supplied a phone number and email address. This helps patrons who have never ridden a bus before learn that it is quite easy to do. YOUNG ADULTS WBKI produced this spot.
TARC	"Manners"	:30	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explains the manners patrons should have while riding a bus. For example, no loud music, no food or drinks, etc. This helps patrons who have never ridden a bus before learn that it is quite easy to do. YOUNG ADULTS WBKI produced this spot.
TARC	"Locate a Bus"	:30	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explains how to locate a bus and find the correct transfers and connections. This helps patrons who have never ridden a bus before learn that it is quite easy to do. YOUNG ADULTS WBKI produced this spot.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
TARC	"Hop on Board"	5 minutes	WBKI produced this special , which will be shown in a large spectrum of Louisville schools. The goal of this campaign is to encourage responsible children to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explains how to locate a bus and find the correct transfers and connections, proper manners, how to request a schedule, and how to request a stop. This helps patrons who have never ridden a bus before learn that it is quite easy and enjoyable to ride a bus. YOUNG ADULTS
Paralyzed Veterans of America	"Children Help Paralyzed Veterans"	:60	These spots feature the story of a group of 10 and 11 year-old children who banded together to help paralyzed veterans. It encourages other children to do the same. CHILDREN
National Sleep Foundation	"Accident"	:30	The goal of this campaign is inform the public that sleep deprivation kills more than 1,500 people every year in highway accidents and injures 71,000 more. It has been linked to health and safety risks and costs our economy billions of dollars a year in lost productivity. A website address is posted so people can get help. ADULTS
Pool Safety	"My Mommy Says"	:30	The goal of this campaign is to inform children about water safety in the swimming pool. CHILDREN
Federal Consumer Info Center	"Up In The Air"	:10 :60	This campaign urges viewers to use the internet and the Federal Government in order to stand up for their rights when it comes to consumer problems. ADULTS
Am. College of Physicians	"Men Don't Have The Corner On Heart Disease"	:30	This campaign warns and informs women about the risks of heart disease. ADULT WOMEN

Education-Horatio Alger Assn.	"Feel The Flame"	:30	Not everyone is born into fame and fortune. We all face obstacles, some harder than others. This spot encourages young people to hold onto their dreams. It also leads them to a website featuring successful Americans who have overcome the adversities of the world and achieved their version of the American dream. CHILDREN
UNICEF – Global Movement For Children	"Say YES For Children"	:30	The goal of this campaign is to inspire and encourage individuals and groups from every corner of the globe to do everything they can to realize a new vision for children – an end to the poverty, ill health, violence and discrimination that have needlessly blighted and destroyed so many young lives. ADULTS
4-H Club	"Kids' Story"	:10 :30	This campaign encourages children to join 4-H, a volunteer group who, through helping others are positively influenced. These children fix stuff, work in the woods, clean up the park, and make many new friends along the way. CHILDREN
Entertainment Software Rating Board	"Right Game"	:30	This PSA urges parents to check the rating when choosing video or software games for their families. Not enough parents are aware of a simple rating system that was established to help them choose the right games for their homes.



WBKI Television

Channel 34, Cable 7

Public Service Announcements Report

WBKI TV 34 / CABLE 7

The following is a listing of some of the significant issues responded to by station WBKI, Louisville, Kentucky, along with the most significant public service announcement treatment of those issued for the period **January 1 2001** to **March 31 2001**. The listing is by no means exhaustive. The order in which the issues appear does not reflect any priority or significance. Please see the attached list for the dates and times these aired.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
American Dental Association	"What to do if you lose a tooth"	30 seconds	The goal of the campaign is to explain to children not to be scared if a tooth is knocked out while the child is playing. It explains that the tooth can be saved, and they are to take the tooth to a parent and then to immediately see a dentist. The dentist may be able to put the tooth back in the child's mouth. This campaign is geared towards children.
American Diabetes Association	"Awareness"	1 minute 30 seconds	The goal of the campaign is to create diabetes awareness, and to stress to those who do have diabetes to take proper care of themselves nutritionally, with exercise, and with their medicine. This campaign is geared towards adults.
Veteran's Hospital	"Games - Travis"	15 seconds	The goal of the campaign is to motivate viewers to make donations to their local veterans' hospital. It shows that some funds go towards purchasing games, as they help the mental health of disabled vets. This campaign is geared towards adults.
US Department of Health	"Cosby"	30 seconds 30 seconds 30 seconds 30 seconds	The goal of the campaign is to inform children about the importance of taking care of themselves through nutrition, dental hygiene, immunization etc. This campaign is geared towards children.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Children's Academics	"Math"	30 seconds	The goal of the campaign is to motivate children to study math in school, and that it is fun to learn math. This campaign is geared towards children.
Computers and Kids	"Teen Central"	30 seconds	The goal of this campaign is to encourage children to use the "Teen Central" website if they are in need of emotional. This campaign is geared towards children.
Junior Achievers	"Junior Achievers"	30 seconds 30 seconds 1 minute	The goal of this campaign is to encourage adults, to get involved with kids, and to donate the organization locally. This campaign is geared towards adults.
Bone Marrow Donation	"Save a Life"	1 minute	The goal of this campaign is to encourage viewers to donate bone marrow, as it can help save lives and often there are shortages of particular blood types. This campaign is geared towards adults.
March of Dimes	"Stork"	30 seconds 15 seconds	The goal of this campaign is to encourage mothers-to-be to take care of themselves during their pregnancies and to help prevent birth defects. This campaign is geared towards adults, particularly women.
Operation Brightside	"Operation Brightside"	1 minute 30 seconds	The goal of this campaign is to promote education and learning. It shows that adults can help children learn and get excited about school. This campaign is geared towards children and adults.
US Army	"Graduate"	30 seconds 20 seconds	The goal of this campaign is to encourage high school students to graduate, and once they do, to consider joining the US army. This campaign is geared towards older kids and young adults.
National Association of Insurance Companies	"Insurance Fraud"	30 seconds	The goal of this campaign is to inform viewers to protect themselves from insurance fraud, particularly from phone calls that quote a low prize and take credit card info over the phone. This campaign is geared towards adults.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Stroke Awareness	"Ambulance"	30 seconds	This campaign dramatically informs viewers the signs and symptoms of suffering from a stroke. It stresses the importance of getting to a hospital quickly, and reminds viewers to take good care of their health so they can help avoid strokes. This campaign is geared towards adults.
Education	"Ignite the Dream - Horatio"	30 seconds	This campaign is geared towards children, particularly African American children, and shows kids that with a good education, anything is possible. This campaign is geared towards children.
US Army	"Montage"	30 seconds	This campaign shows all of the different things recruits do in the army. It encourages viewers to join and make the army their career. This campaign is directed towards young adults.
War on Drugs	"Kids Choices"	30 seconds 20 seconds	This campaign is geared towards helping parents teach their children to say "no" to drugs. It reminds parents that their children really do have a choice, and they should choose "no" when offered to do illegal drugs. This PSA also promotes children to take care of their health by staying drug-free. This campaign is geared towards adults.
Cholesterol Screening	"Cholesterol Screening"	30 seconds	This campaign reminds viewers that a healthy cholesterol level is very important. It asks viewers to have their cholesterol checked, and to take good care of their health through nutrition and exercise. This campaign is geared towards adults.
Brain Injury	"Brain Injury"	30 seconds 30 seconds	This campaign reminds viewers it is very important to protect their heads while participating in sports or other activities. It reminds viewers to wear a helmet when it is needed. This spot also explains brain injuries and the importance of education on this topic. This campaign is geared towards adults.
U.S. Health Department	"Teeth"	30 seconds	This campaign explains the importance of children (and adults) of taking care of their teeth, brushing, flossing, etc. This campaign is geared towards adults and their children.
American Diabetes Association	"Exercise"	30 seconds	The goal of the campaign is to create diabetes awareness, and to stress to those who do have diabetes to take care of themselves by exercising and staying fit. This campaign is geared towards adults.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Schools for Excellence	"Schools for Excellence"	1 minute	The goal of this campaign is to promote excellent academics, and to remind teachers, parents, and children that it takes all of us to make an excellent school. It also asks adults and parents to become more involved with their local schools. This campaign is geared towards adults and children.
Bureau of Motor Vehicles	"License Plates"	30 seconds 30 seconds	The goal of this campaign is to remind viewers to renew their license plates, and to consider making a donation to support schools, the environment, etc., and receive a special license plate. This campaign is geared towards adults.
American Speech & Hearing Asso.	"American Speech & Hearing Asso."	15 seconds 1 minute	The goal of this campaign is remind viewers the importance of having your child's speech and hearing checked, and to be more thoughtful in communicating with someone who does have speech or hearing problems. This campaign is geared towards adults.
Vote America's Tree	"Vote America's Tree"	15 seconds 30 seconds 1 minute	This campaign encourages viewers to log on to a specific website to vote for America's national tree. This campaign is geared towards adult and children.
RADD	"Marc Anthony"	30 seconds	This campaign shows the Recording Artists & Actors support against drunk driving. It encourages viewers not to drink and drive or if they are going to drink to have a friend or cab drive for them. This psa is geared towards young adults and adults.
Drug Prevention	"Drug Prevention"	30 seconds 20 seconds	This campaign is designed to help education adults and kids about illegal drugs, and to help them say no to drugs. This campaign is geared towards adults and children.
Buckle Up	"African Americans"	30 seconds	This campaign educates African Americans about the importance of wearing seat belts, explaining that the statistics for African Americans dying due to not wearing seat belts is very high. This campaign is geared towards young adults and adults.
RADD	"98 Degrees"	30 seconds	This campaign shows the Recording Artists & Actors support against drunk driving. It encourages viewers not to drink and drive or if they are going to drink to have a friend or cab drive for them. This psa is geared towards young adults and adults.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Wildlife Defenders	"Wildlife Defenders"	30 seconds 20 seconds 1 minute	The goal of this campaign is to educate adults and kids about saving wildlife and endangered species. It is geared towards children and adults.
Internal Revenue Service	"E-File"	30 seconds	The goal of this campaign is to remind viewers it is income tax time, and they can file electronically on a new IRS website. This will help people file their returns more quickly and easily, and hopefully avoid late fees and penalties. This campaign is geared towards adults.
Kentucky Harvest	"Kentucky Harvest"	10 seconds 10 seconds 10 seconds	WBKI produced and aired this announcement in hopes to inform viewers about the Kentucky Harvest Program, and assist in obtaining donations for Kentucky Harvest. Kentucky Harvest is a local organization that takes unused food from homes and for-profit organizations and gives it to non-profit organizations (such as homeless shelters), in order to help feed those who otherwise would have no food to eat.
Black History Month	"Black Achievers"	30 seconds 30 seconds 30 seconds 30 seconds 30 seconds 30 seconds 30 seconds 30 seconds	WBKI produced and aired these PSA's in order to celebrate Black History Month. These spots highlighted a variety of students and business people in and around the Louisville area. The individuals who were acknowledged are local achievers and were congratulated for their achievements.
McGruff Crime Prevention	"Bully"	30 seconds	The goal of this campaign is to help children learn to deal with bullies. It reminds children the best way to deal with a bully is to walk away. This campaign is geared towards children.
American Dental Association	"Dino Baby's First Tooth"	30 seconds	The goal of this campaign is to explain to small children what teeth are and how to take care of them (brushing, flossing, etc). It promotes good dental hygiene. This campaign is geared towards children.
Snowboard Safety	"Lemmings"	30 seconds	The goal of this campaign is to inform viewers about snowboard safety and to tell viewers not to follow inappropriate snowboard behavior, to be safe. This campaign is geared towards children and adults.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Libraries	"Skateboard"	30 seconds	The goal of this campaign is to encourage kids to go to their local libraries and start reading books. It shows that it is cool to read! This campaign is geared towards children.
Use a Computer	"Get Tech"	30 seconds	The goal of this campaign is to encourage adults and children to learn how to use computers. It demonstrates that computers can take us all over the world and teach us many different things. This campaign is geared towards children and adults.
Americorps	"Americorps"	30 seconds	The goal of this campaign is to encourage children and adults to join and support the Americorps. It provides information on how to contact Americorps. This campaign is geared towards adults and children.
MADD	"Tiffany"	30 seconds	This campaign shows the importance of stopping drunk driving. It focuses on a Purdue University student who was killed by a drunk driver. It encourages viewers not to drink and drive or if they are going to drink to have a friend or cab drive for them. This psa is geared towards young adults and adults.
Boys & Girls Club	"Boys & Girls Club"	10 seconds	This campaign encourages adults to get involved with their local boys and girls club, that the children in these clubs really would appreciate good role models. This campaign is geared towards children and adults.
Boys & Girls Club	"Boys & Girls Club"	30 seconds 1 minute	This campaign encourages adults to get involved with their local boys and girls club, that the children in these clubs really would appreciate good role models. This campaign is geared towards adults.
America's Promise	"Colin Powell"	30 seconds	This campaign is geared towards taking care of and supporting American Veterans. This campaign is geared towards adults.
American Diabetes Association	"Grandpa"	30 seconds	This campaign is designed to remind adults, especially older adults to take care of themselves if they have diabetes through nutrition, exercise, and medical attention. It reminds viewers to take proper measures to prevent diabetes, too. This campaign is geared towards adults.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Marines	"Marines"	30 seconds	The goal of this campaign is to promote the Marine Corp and encourage young adults and adults to join the marines as a career. This campaign is geared towards young adults and adults.
TARC	"Request Your Stop"	30 seconds	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explained how patrons can request their bus stop when they are ready to exit the bus. This helps patrons who have never ridden a bus before learn that it is quite easy to do. This campaign is geared towards older children and adults. WBKI produced this spot.
TARC	"Request your Schedule"	30 seconds	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explained how patrons can request a bus schedule and supplied a phone number and email address. This helps patrons who have never ridden a bus before learn that it is quite easy to do. This campaign is geared towards older children and adults. WBKI produced this spot.
TARC	"Manners"	30 seconds	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explains the manners patrons should have while riding a bus. For example, no loud music, no food or drinks, etc. This helps patrons who have never ridden a bus before learn that it is quite easy to do. This campaign is geared towards older children and adults. WBKI produced this spot.
TARC	"Locate a Bus"	30 seconds	The goal of this campaign is to encourage responsible children and adults to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explains how to locate a bus and find the correct transfers and connections. This helps patrons who have never ridden a bus before learn that it is quite easy to do. This campaign is geared towards older children and adults. WBKI produced this spot.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
TARC	"Hop on Board"	5 minutes	WBKI produced this special, which will be shown in a large spectrum of Louisville school. The goal of this campaign is to encourage responsible children to use the Transit Authority of River City Bus System. It helps conserve gas, and supports the city. This spot explains how to locate a bus and find the correct transfers and connections, proper manners, how to request a schedule, and how to request a stop. This helps patrons who have never ridden a bus before learn that it is quite easy and enjoyable to ride a bus. This campaign is geared towards older children and adults.



WB 34, Cable 7

Public Service Announcements Report

WWWB TV 34 / CABLE 7

There follows a listing of some of the significant issues responded to by station WWWW, Louisville, Kentucky, along with the most significant public service announcement treatment of those issued for the period **May 1 2000** to **July 14 2000**. The listing is by no means exhaustive. The order in which the issues appear does not reflect any priority or significance. Please see the attached list for the dates and times these aired.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
American Cancer Society	"Cycle of Hope"	15 seconds	The goal of the campaign is to create cancer awareness, particularly prostate cancer awareness.
American Cancer Society	"Cycle of Hope"	30 seconds	The goal of the campaign is to create cancer awareness, particularly prostate cancer awareness.
Organ Donation	"Choose to Donate"	30 seconds	The goal of the campaign is to motivate viewers to consider donating their organs in case of an untimely death, and to share your wishes with your family.
Make a Wish Foundation	"Help Make Wishes Come True"	30 seconds	The goal of the campaign is to inform viewers about the foundation that assists terminally ill children in seeing their dreams come true.
United States Marines	"The Few, the Proud, the Marines"	30 seconds	The goal of this campaign was to promote the Marine Corp. and encourage to viewers to consider joining the marines.

Description of Issue	Program/Segment	Duration	Description of Program/Segment
Children's Academics	"Math"	30 seconds	The goal of the campaign is to motivate children to study math in school, and that it is fun to learn.
Computers and Kids	"Teen Central"	30 seconds	The goal of this campaign is to encourage children to use the "Teen Central" website if they are in need of emotional.
Osteoporosis Foundation	"Take Charge"	20 seconds 30 seconds 60 seconds	The goal of this campaign is to encourage adults, particularly women, to take care of themselves and visit their doctors in order to stay healthy and stay clear of osteoporosis.
Occupational Safety	"Roll Bars"	30 seconds	The goal of this campaign is to encourage farmers or anyone who uses heavy equipment to install roll bars on their tractors in case of an accident. It could prevent serious injury and save a life.
Carbon Monoxide	"Tractor"	30 seconds	The goal of this campaign is to encourage farmers or anyone who uses heavy farm equipment to regularly check equipment to make sure it is running properly so there is no chance of carbon monoxide poisoning.
The Vision Counsel	"Alex Trebek"	60 seconds 30 seconds 20 seconds	The goal of this campaign is to promote that viewers, especially senior citizens, have routine eye exams in order to keep their vision clear and healthy.
EDS	"Wake Up"	60 seconds 30 seconds	The goal of this campaign is to encourage adults who fall asleep quickly and easily to see their family physicians, as they may suffer from a sleep disorder.
American Dental Association	"What to do if You Lose a Tooth"	30 seconds	The goal of this campaign is to inform children how to take care of a tooth if one is knocked out while playing. It also promotes good dental hygiene.
Public Safety & Civic / Neighborhood: Tucson Police Dept.	"Drive-By"	30 seconds	To inform the citizens of Tucson that Tucson Police Dept. also make "drive-bys" to protect the neighborhoods. And also they are here to assist Tucsonans in many ways.

EXHIBIT B

Letter from Eddie Robinson to FCC Secretary dated September 11, 2001

Judge/Executive



Treasurer

Magistrates:

Bobby Kintley - 1st Dist.
Orville Newton - 2nd Dist.
James Cochran - 3rd Dist.

Magistrates:

Marshall Caulk - 4th Dist.
Edward Garin - 5th Dist.
J W McFarland - 6th Dist.

OFFICE OF THE JUDGE/EXECUTIVE
TAYLOR COUNTY

County Courthouse
203 N. Court St., Suite 4
Campbellsville, Kentucky 42718
270-465-7729 - 270-465-7117

STAMP & RETURN

September 11, 2001

Secretary
Federal Communications Commission
445 Twelfth Street, Southwest
Washington, DC 20554

RECEIVED

SEP 12 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: RM-1041, MM Docket No. 01-148
Notice of Proposed Rule Making on Campbellsville, Kentucky

Dear Sir Or Madam:

I serve as the County Judge Executive of Taylor County, Kentucky. WDRB-TV in Louisville has asked me to provide these comments on the proposal of Louisville Communications, LLC to change the community of license of WBKI-TV, Channel 34, from Campbellsville, Kentucky, to Bardstown.

I am well aware of WBKI-TV's operations. Almost since I took office, I have been spending a considerable amount of time and energy attempting to get WBKI-TV to resolve serious complaints about interference to television reception in Taylor County.

Prior WBKI-TV's move to a new transmitter site closer to Louisville, residents in Taylor County and other nearby areas were able to receive a number of television station signals off-air with little difficulty. However, since the station's move, several hundred homes in Taylor County (plus others in surrounding counties) have completely lost the ability to receive any television station signal off-air other than WBKI-TV's. In fact, WBKI-TV appears on every channel of affected television sets, and it even interferes with channels viewed on the local cable system.

I have tried on numerous occasions to discuss this matter with WBKI-TV, but I have been told verbally by station management that they need not discuss it with me. According to them, Taylor County residents are not entitled to receive signals from Louisville stations. However, I believe that Taylor County is in fact one of the counties within the Louisville television market.



Equal Opportunity Employer MBE/D

In recent years, the station has stopped serving Campbellsville and Taylor County altogether. According to recent quarterly reports for WBKI-TV that I reviewed and to my own knowledge. WBKI-TV no longer broadcasts any news, information or events about or for area residents. I also do not know of any meetings that WBKI-TV's management has done with local leaders or of any other activities that WBKI-TV engages in for Taylor County.

I have now learned that WBKI-TV has asked the FCC for permission to remove its channel allocation from Campbellsville. In light of WBKI-TV's past reluctance to interact with us as required by the FCC's rules and regulations, I urge the FCC to refuse to allow WBKI-TV to completely abandon its obligation to serve Campbellsville and Taylor County.

Very truly yours,



Eddie Rogers

Cc: Mark N. Lipp
Tamara Y. Brown
Shook, Hardy & Bacon
600 14th Street, N.W., Suite 800
Washington, D.C. 20005

CERTIFICATE OF SERVICE

I, Kevin P. Latek of Dow, Lohnes & Albertson, PLLC, do hereby certify that on this 12th day of September 2001, I caused a copy of the foregoing **Reply Comments of Independence Television Company** to be served on the following:

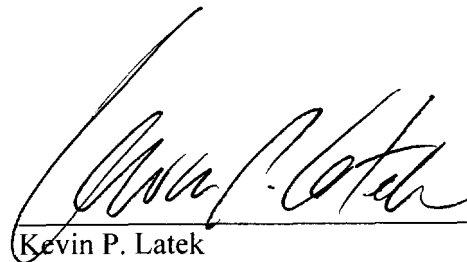
By Hand:

John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Victoria M. McCauley
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

By U.S. Mail:

Mark N. Lipp
Tamara Y. Brown
Shook, Hardy and Bacon
600 14th Street, NW
Suite 800
Washington, D.C. 20005
(Counsel to Petitioner)



Kevin P. Latek